

Mr. Daniel Duncan  
EPA Region 10  
Office of Compliance and Enforcement  
P: (206) 553-6693  
F: (206) 553-1775

Dt: September 22, 2010

Re: PCB Remediation Waste Storage Approval; Winter 2010-2011  
Port Heiden Former RRS; Port Heiden, Alaska

Dear Mr. Duncan:

This letter requests approval for a risk-based method to store Polychlorinated Biphenyl (PCB) remediation waste during the winter of 2010-2011. The waste resulted from historical releases of PCBs at the Former RRS in Port Heiden, Alaska (Site). The waste would be stored onsite until early summer 2011 when it will be removed via barge; it will not remain on Site longer than 365 days after excavation. This request is made on behalf of the Native Village of Port Heiden (NVPH). If approved, storage of this PCB waste will meet the following conditions.

- a. The total stored PCB volume will be roughly 900 cubic yards (CY), approximately 25 CY of which will be regulated PCB remediation waste that is  $\geq$  50 parts per million (ppm). This material will be stored in five, 5-CY super sacks.
- b. The remaining 875 CY of PCB remediation waste will be unregulated,  $\leq$  50 ppm. This material will be stored in roughly 175, 5-CY super sacks.
- c. The super sacks containing the PCB waste will be lined. Additionally, these super sacks will be placed on a 20-mil reinforced polyethylene liner that is underlain by geotextile. The sacks would then be covered with a 12-mil liner for the winter. To prevent any migration off Site as required under 40 CFR § 761.65(c)(9)(iii), the edges of this 12-mil liner will be buried and shall encompass the outside of the 20-mil liner. Numerous sandbags will be placed on top of the 12-mil liner.
- d. The PCB waste will be stored at the Site as required by 40 CFR §§ 761.65(c)(9)(i) and (iii)(B); it will not be transported off Site. The storage area will be constructed and marked in accordance with 40 CFR § 761.40(a)(10) and 40 CFR § 761.65(c)(3).
- e. All PCB super sacks in excess of 50 ppm will be dated to indicate the date the PCB item was placed into storage. These super sacks and the liner cover will be marked with a yellow M<sub>L</sub> mark in accordance with 40 CFR § 761.40(h).
- f. Records will be established and maintained as required by 40 CFR § 761.180 and 40 CFR § 761.65(c)(10).

It is our hope that, pursuant to 40 C.F.R. § 761.61(c), the Environmental Protection Agency will find the proposed risk-based storage method does not pose an unreasonable risk of injury to health or the environment.

If you have any questions, please feel free to contact me at (907) 317-7721 or via email at [thor.kallestad@boretide.us](mailto:thor.kallestad@boretide.us). Thanks for your time.

Sincerely,

Thor Kallestad  
Boretide Consulting  
On Behalf of the NVPH

cc: Mrs. Gerda Kosbruk, NVPH  
Mr. Louis Howard, ADEC  
Mr. Pat Roth, 611 CES/CEVR  
Mr. David Jadhon, USACE